

State of Utah

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Title V Operating Permit

PERMIT NUMBER: 500093001

DATE OF PERMIT: June 25, 2002

Date of Last Revision: June 25, 2002

This Operating Permit is issued to, and applies to the following:

Name of Permittee:

Permitted Location:

Pepperidge Farm Incorporated
901 North 200 West
Richmond, UT 84333

Commercial Bakery
901 North 200 West
Richmond, UT 84333-1499

UTM coordinates: 4,643,210 meters Northing, 432,484 meters Easting
SIC code: 2051

ABSTRACT

Pepperidge Farm is a commercial food products manufacturer located in Richmond, Utah. The operation is a major source for volatile organic compounds (VOC), primarily ethanol. Emissions from Bakery Line 5 are controlled by a catalytic oxidizer. Pepperidge Farm is located in Cache County, an attainment area for all pollutants.

UTAH AIR QUALITY BOARD

By:

Prepared By:

Richard W. Sprott, Executive Secretary

Robert Grandy

Operating Permit History

6/25/2002 - Permit issued	Action initiated by an initial operating permit application	
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Table of Contents

SECTION I: GENERAL PROVISIONS.....	1
I.A. FEDERAL ENFORCEMENT	1
I.B. PERMITTED ACTIVITY(IES).	1
I.C. DUTY TO COMPLY.....	1
I.D. PERMIT EXPIRATION AND RENEWAL	2
I.E. APPLICATION SHIELD.	2
I.F. SEVERABILITY.	2
I.G. PERMIT FEE.....	2
I.H. NO PROPERTY RIGHTS.....	2
I.I. REVISION EXCEPTION.....	3
I.J. INSPECTION AND ENTRY.....	3
I.K. CERTIFICATION	3
I.L. COMPLIANCE CERTIFICATION	3
I.M. PERMIT SHIELD.....	4
I.N. EMERGENCY PROVISION.....	5
I.O. OPERATIONAL FLEXIBILITY.....	5
I.P. OFF-PERMIT CHANGES.	5
I.Q. ADMINISTRATIVE PERMIT AMENDMENTS.	5
I.R. PERMIT MODIFICATIONS.....	6
I.S. RECORDS AND REPORTING.	6
I.T. REOPENING FOR CAUSE.....	7
I.U. INVENTORY REQUIREMENTS.....	8
SECTION II: SPECIAL PROVISIONS.....	9
II.A. EMISSION UNIT(S) PERMITTED TO DISCHARGE AIR CONTAMINANTS.	9
II.B. REQUIREMENTS AND LIMITATIONS.	9
II.B.1 <u>Conditions on permitted source (Source-wide)</u>	10
II.B.2 <u>Conditions on Process Line #1 Oven (L1)</u>	13
II.B.3 <u>Conditions on Process Line #2 Oven (L2)</u>	13
II.B.4 <u>Conditions on Process Line #3 Oven (L3)</u>	14
II.B.5 <u>Conditions on Process Line #5 Oven (L5)</u>	14
II.B.6 <u>Conditions on Process Line #7 Oven (L7)</u>	17
II.B.7 <u>Conditions on Boiler (B1)</u>	17
II.B.8 <u>Conditions on Pan Washer and Dryer (PW1)</u>	18
II.B.9 <u>Conditions on Three Diesel Powered Pumps (DP1 -3)</u>	18
II.C. EMISSIONS TRADING.....	19
II.D. ALTERNATIVE OPERATING SCENARIOS.....	19
SECTION III: PERMIT SHIELD	19
SECTION IV: ACID RAIN PROVISIONS.....	19

Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

Section I: General Provisions

I.A. Federal Enforcement.

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

I.B. Permitted Activity(ies).

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

I.C. Duty to Comply.

I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))

I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))

I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))

I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay

any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

I.D. Permit Expiration and Renewal.

I.D.1 This permit is issued for a fixed term of five years and expires on June 25, 2007. (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due by December 25, 2006. An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E. Application Shield.

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F. Severability.

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G. Permit Fee.

I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

I.H. No Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

I.I. Revision Exception.

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

I.J. Inspection and Entry.

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

I.K. Certification.

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

I.L. Compliance Certification.

I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than June 25, 2003 and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))

I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;

I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such

methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice
(mail code 8ENF)
EPA, Region VIII
999 18th Street, Suite 300
Denver, CO 80202-2466

I.M. Permit Shield.

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))
- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))
- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))

I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

I.N. Emergency Provision.

I.N.1 An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))

I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))

I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))

I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))

I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))

I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))

I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

I.O. Operational Flexibility.

Operational flexibility is governed by R307-415-7d(1).

I.P. Off-permit Changes.

Off-permit changes are governed by R307-415-7d(2).

I.Q. Administrative Permit Amendments.

Administrative permit amendments are governed by R307-415-7e.

I.R. **Permit Modifications.**

Permit modifications are governed by R307-415-7f.

I.S. **Records and Reporting.**

I.S.1 Records.

I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))

I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))

I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.

I.S.1.b.2 The date analyses were performed.

I.S.1.b.3 The company or entity that performed the analyses.

I.S.1.b.4 The analytical techniques or methods used.

I.S.1.b.5 The results of such analyses.

I.S.1.b.6 The operating conditions as existing at the time of sampling or measurement.

I.S.1.c Additional record keeping requirements, if any, are described in Section II, Special Provisions.

I.S.2 Reports.

I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))

I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))

I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 14 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))

I.S.3 Notification Addresses.

I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:

Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820
Phone: 801-536-4000

I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII
Office of Enforcement, Compliance and
Environmental Justice (mail code 8ENF)
999 18th Street, Suite 300
Denver, CO 80202-2466

For reports, notifications, or other correspondence
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII
Office of Partnerships & Regulatory Assistance
Air & Radiation Program (mail code 8P-AR)
999 18th Street, Suite 300
Denver, CO 80202-2466
Phone: 303-312-6440

I.T. **Reopening for Cause.**

I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U. **Inventory Requirements.**

I.U.1 An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

I.U.2 A Hazardous Air Pollutant Inventory shall be submitted in accordance with the procedures of R307-155, Hazardous Air Pollutant Inventory. (R307-155)

Section II: SPECIAL PROVISIONS

II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.

(R307-415-4(3)(a) and R307-415-4(4))

II.A.1 Process Line #1 Oven(designated as L1)

Unit Description: Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 3.2 MM Btu/hr.

II.A.2 Process Line #2 Oven(designated as L2)

Unit Description: Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 3.2 MM Btu/hr.

II.A.3 Process Line #3 Oven(designated as L3)

Unit Description: Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 5.17 MM Btu/hr.

II.A.4 Process Line #5 Oven(designated as L5)

Unit Description: Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 9.9 MM Btu/hr. There are two stacks, one for combustion emissions and one for product emissions that pass through a catalytic oxidizer.

II.A.5 Process Line #5 Radio Frequency Dryer(designated as R1)

Unit Description: Product passes from Process Line No. 5 Oven into Radio Frequency Dryer. No unit-specific applicable requirements.

II.A.6 Process Line #7 Oven(designated as L7)

Unit Description: Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 5.3 MM Btu/hr.

II.A.7 Boiler(designated as B1)

Unit Description: Pre-NSPS Natural Gas/Propane Fired Boiler used for plant heating and process steam, approximate rating 10.5 MM BTU/hr.

II.A.8 Pan Washer and Dryer(designated as PW1)

Unit Description: Natural Gas/Propane Fired Heater, approximate rating 0.8 MM BTU/hr.

II.A.9 Storage Silos(designated as SS)

Unit Description: Six flour storage silos and one sugar silo, equipped with bin vents for the control of flour and sugar dust during transfer operations.

II.A.10 Three Diesel Powered Pumps(designated as DP1-3)

Unit Description: Pumps are used intermittently as backup well water pumps or as emergency fire suppression pumps. Pumps are rated at approximately 0.38, 0.44, and 0.17 MM Btu/hr.

II.A.11 Miscellaneous Equipment(designated as M1)

Unit Description: Miscellaneous equipment such as oil tanks (non NSPS), diesel oil tanks (non NSPS), refrigeration system, label printer, small sandblasting glove booth, etc. No unit-specific applicable requirements.

II.A.12 Propane Storage Tanks(designated as P1-3)

Unit Description: Two 30,000 gallon liquid propane tanks and one 1,000 gallon propane vapor tank. No unit-specific applicable requirements.

II.B. Requirements and limitations.

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

II.B.1 **Conditions on permitted source (Source-wide)**

II.B.1.a **Condition:**

The permittee shall comply with the applicable requirements for recycling and emission reduction for class I and class II refrigerants pursuant to 40 CFR 82, Subpart F - Recycling and Emissions Reduction. [Authority granted under 40 CFR 82.150(b); condition originated in 40 CFR Part 82 Subpart F]

II.B.1.a.1 **Monitoring:**

The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart F.

II.B.1.a.2 **Recordkeeping:**

All records required in 40 CFR 82, Subpart F shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.

II.B.1.a.3 **Reporting:**

All reports required in 40 CFR 82, Subpart F shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.

II.B.1.b **Condition:**

Natural gas consumption shall be no greater than 385 MM Scf per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.1.b.1 **Monitoring:**

Natural gas consumption shall be determined using billing statements from the previous twelve months. A rolling twelve month total of natural gas usage shall be calculated by the seventh day of each month using the previous twelve months data.

II.B.1.b.2 **Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.b.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.c **Condition:**

Fuel oil consumption shall be no greater than 2300 gal/12 month-rolling period (for stationary equipment). [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.1.c.1 **Monitoring:**

Fuel usage shall be determined each month using billing records, dip-stick measurements, or other appropriate methods. A rolling twelve month total of fuel usage shall be calculated by the seventh day of each month using the previous twelve months data.

II.B.1.c.2

Recordkeeping:

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.c.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.d

Condition:

The permittee shall combust only #1 or #2 low sulfur fuel oils. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.1.d.1

Monitoring:

The record serves as monitoring.

II.B.1.d.2

Recordkeeping:

Receipts showing the grade of fuel oil purchased shall be obtained from the vendor and maintained as records. Documentation from the fuel vendor shall also be maintained to demonstrate that #1 and #2 fuel oils contain 0.5 weight percent sulfur or less.

II.B.1.d.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.e

Condition:

VOC emissions shall be no greater than 161.5 tons per 12-month rolling period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.1.e.1

Monitoring:

VOC emissions shall be calculated as a rolling 12-month total. Based on the seventh day of each month a new 12-month total shall be calculated using data from the previous 12 months.

Plant-wide emissions shall be determined by the summation of VOC from the following sources as specified:

(A) Line 3:

(1) Oven 3 emissions (tpy) = VOC E.F. x tons of product x 1 ton/2000 lbs.

VOC E.F. is the bread oven emissions factor derived from the USEPA Emissions Inventory Branch [Alternative Control Technology Document for Bakery Oven Emissions EPA 453/R-92-017, December 1992)] The equation is:

VOC E.F.= $0.95Y_i + 0.195 t_i - 0.51S - 0.86ts + 1.90$, where:

VOC E.F. = pounds VOC per ton of baked bread

Y_i = initial baker's percent of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percent of yeast

t_s = spiking time in hours.

(2) Fugitive emissions = $1/9 \times$ Oven 3 emissions.

(B) Line 7:

(1) Oven 7 emissions = VOC E.F. \times tons of product \times 1 ton/2000 lbs.

VOC E.F. is the bread oven emissions factor derived from the USEPA Emissions Inventory Branch [Alternative Control Technology Document for Bakery Oven Emissions EPA 453/R-92-017, December 1992] The equation is:

$$\text{VOC E.F.} = 0.95Y_i + 0.195 t_i - 0.51S - 0.86t_s + 1.90, \text{ where:}$$

VOC E.F. = pounds VOC per ton of baked bread

Y_i = initial baker's percent of yeast

t_i = total yeast action time in hours

S = final (spike) baker's percent of yeast

t_s = spiking time in hours.

(2) Fugitive emissions = $1/9 \times$ Oven 7 emissions.

(C) Line 5 :

(1) Oven 5 emissions = Oven 5 E.F. \times tons of product \times 1 ton/2000 lbs \times 0.05, where:

Oven 5 E.F. = 20.4 lb VOC/ton product (based on testing at several Pepperidge Farms facilities).

(2) Fugitive emissions = $1/9 \times$ Oven 5 emissions.

(D) Combustion source VOC emissions = source fuel usage \times VOC emissions factor \times 1 ton/2000 lbs.

VOC emissions factors [USEPA, AP-42]:

Natural gas = 5.28 lb VOC/MM scf natural gas.

Diesel = 0.35 lb VOC/MM Btu

LPG/propane = 0.5 lb VOC/1000 gal.

(origin: DAQE-620-01)

II.B.1.e.2

Recordkeeping:

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.e.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2

Conditions on Process Line #1 Oven (L1)

II.B.2.a

Condition:

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.2.a.1

Monitoring:

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.2.a.2

Recordkeeping:

The permittee shall keep records of all fuel types used.

II.B.2.a.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3

Conditions on Process Line #2 Oven (L2)

II.B.3.a

Condition:

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.3.a.1

Monitoring:

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.3.a.2

Recordkeeping:

The permittee shall keep records of all fuel types used.

II.B.3.a.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.4 **Conditions on Process Line #3 Oven (L3)**

II.B.4.a **Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.4.a.1 **Monitoring:**

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.4.a.2 **Recordkeeping:**

The permittee shall keep records of all fuel types used.

II.B.4.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.5 **Conditions on Process Line #5 Oven (L5)**

II.B.5.a **Condition:**

Emissions of VOC shall be no greater than 2.55 lb/hr from the catalytic oxidizer. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.5.a.1 **Monitoring:**

Compliance with the above VOC emissions limitation shall be demonstrated through stack testing and by monitoring operation conditions indicative of catalyst performance.

(A) Stack testing shall be performed every 5 years, with the next test due by August 3, 2005. Tests shall be performed as follows:

(1) Notification: the Executive Secretary shall be notified at least 30 days prior to conducting any required emission testing. A source test protocol shall be submitted to DAQ when the testing notification is submitted to the Executive Secretary.

The source test protocol shall be approved by the Executive Secretary prior to performing the test(s). The source test protocol shall outline the proposed test methodologies, stack to be tested, and procedures to be used. A pretest conference shall be held, if directed by the Executive Secretary.

(2) Sample Location: the emission point shall be designed to conform to the requirements of 40 CFR 60, Appendix A, Method 1, or other methods as approved by the Executive Secretary. An Occupational Safety and Health Administration (OSHA) or Mine Safety and Health Administration (MSHA) approved access shall be provided to the test location

(3) Volumetric Flow Rate: 40 CFR 60, Appendix A, Method 2

(4) Volatile Organic Compounds (VOCs): 40 CFR 60, Appendix A, Method 18 or other method approved by the Executive Secretary.

(5) Calculations: to determine mass emission rates (lb/hr, etc.) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Executive Secretary, to give the results in the specified units of the emission limitation.

(6) The production rate during all compliance testing shall be no less than 90% of the maximum production achieved in the previous three (3) years.

(B) Operation conditions indicative of catalyst performance shall be monitored as follows:

(1) Production status in terms of normal production, start-up and shutdown, and malfunction conditions.

(i) Normal production is defined by periods of operation in which the oven conveyor is full of dough/product and the exhaust gases have reached equilibrium. Exhaust gases are at equilibrium when the oven has been full of dough/product for a period of two times the unit product residence time in the oven until the dough ceases to enter the oven. Periods of start-up and shut-down, and malfunction are excluded from normal production.

(ii) Start-up and shutdown is defined by the start or end of a production cycle in which the oven conveyor is not full of dough.

(iii) Malfunction is defined by periods in which a malfunction of the oven, oxidizer, or monitoring system occurs which requires shutdown or maintenance.

(2) Production rate shall be monitored and used to determine residence time.

(3) During normal production, the catalyst inlet temperature shall be monitored and maintained at 699.4 degrees F or greater, and temperature rise across the catalyst shall be monitored and maintained at 55 degrees F or greater. Temperature rise shall be determined from catalyst inlet and outlet temperature measurements based on a 3-hour rolling average of data collected every ten minutes. Thermocouples permanently located at the catalyst inlet and outlet shall be used to measure inlet and outlet temperatures and shall be calibrated semi-annually.

(4) Pepperidge Farm will conduct an evaluation of production and operational parameters if the temperature rise across the catalyst drops

below 55 degrees F more than 2 times in one day, or 10 times over a seven day period, during normal production. The evaluation shall include but not be limited to:

- (i) A review for potential changes in product formulation, throughput, and air flow exhaust.
- (ii) Inspection of the thermocouples and recalibration if necessary.

(5) If evaluation results fail to explain the cause for the decrease in temperature rise across the catalyst, and the temperature rise across the catalyst continues to drop below 55 degrees F more than 2 times in one day, or 10 times over a seven day period, Pepperidge Farm will take one or more of the following actions:

(i) Corrective actions such as cleaning the catalyst, raising inlet temperature, etc. to re-establish temperature rise within the specified range. No further action will be required if the temperature rise returns to the specified minimum value or greater.

(ii) Replacement of the catalyst within 60 days. No further action will be required if the temperature rise returns to the specified minimum value or greater.

(iii) Perform a reference test method to determine compliance. If compliance is demonstrated at a different catalyst inlet temperature, then that value will be the new baseline for subsequent parametric monitoring.

II.B.5.a.2

Recordkeeping:

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.5.a.3

Reporting:

The results of stack testing shall be submitted to the Executive Secretary within 60 days of completion of the testing. Reports shall clearly identify results as compared to permit limits and indicate compliance status. There are no additional reporting requirements for this provision except those specified in Section I of this permit.

II.B.5.b

Condition:

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.5.b.1

Monitoring:

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.5.b.2

Recordkeeping:

The permittee shall keep records of all fuel types used.

II.B.5.b.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.5.c

Condition:

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the catalytic oxidizer in a manner consistent with good air pollution control practice for minimizing emissions.

Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [Authority granted under R307-401-5; condition originated in DAQE-620-01]

II.B.5.c.1

Monitoring:

Records required for this permit condition will serve as monitoring.

II.B.5.c.2

Recordkeeping:

Permittee shall document activities performed to assure proper operation and maintenance. Records shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.5.c.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.6

Conditions on Process Line #7 Oven (L7)

II.B.6.a

Condition:

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

II.B.6.a.1

Monitoring:

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.6.a.2

Recordkeeping:

The permittee shall keep records of all fuel types used.

II.B.6.a.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.7

Conditions on Boiler (B1)

II.B.7.a

Condition:

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]

- II.B.7.a.1 **Monitoring:**
In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.
- II.B.7.a.2 **Recordkeeping:**
The permittee shall keep records of all fuel types used.
- II.B.7.a.3 **Reporting:**
There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.8 **Conditions on Pan Washer and Dryer (PW1)**
- II.B.8.a **Condition:**
Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]
- II.B.8.a.1 **Monitoring:**
In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.
- II.B.8.a.2 **Recordkeeping:**
The permittee shall keep records of all fuel types used.
- II.B.8.a.3 **Reporting:**
There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.9 **Conditions on Three Diesel Powered Pumps (DP1-3)**
- II.B.9.a **Condition:**
Visible emissions shall be no greater than 20 percent opacity. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-620-01]
- II.B.9.a.1 **Monitoring:**
When hours of operation for any individual pump exceeds 300 hours during a calendar year, an opacity observation shall be conducted on that pump in accordance with 40 CFR 60, Appendix A, Method 9.
- II.B.9.a.2 **Recordkeeping:**
A log recording all hours of pump operation shall be maintained. The log shall include the results of required monitoring.
- II.B.9.a.3 **Reporting:**
There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C. Emissions Trading.

(R307-415-6a(10))

Not applicable to this source.

II.D. Alternative Operating Scenarios.

(R307-415-6a(9))

Not applicable to this source.

Section III: PERMIT SHIELD

The following requirements have been determined to be not applicable to this source in accordance with Provision I.M, Permit Shield:

III.A. 40 CFR Part 60, Subpart Dc (Standards of Performance for New Stationary Sources)

This regulation is not applicable to the Boiler (B1) because the existing boiler is not subject to the requirements of 40 CFR 60, Subpart Dc due to date of installation. The boiler was installed in 1973, prior to the applicability date of June 9, 1989

Section IV: ACID RAIN PROVISIONS.

This source is not subject to Title IV. This section is not applicable.

REVIEWER COMMENTS

This operating permit incorporates all applicable requirements contained in the following documents:

DAQE-620-01 dated July 27, 2001

1. Comment on an item originating in AO conditions 12 B regarding permitted source (Source-wide)

Opacity from Silos: The opacity limit on the silos, originating in the approval order, is not included in the operating permit. All silos are vented into secondary enclosure buildings. [Comment last updated on 10/12/2001]

2. Comment on an item originating in DAQE-620-01 regarding permitted source (Source-wide)

AO condition 17: Inventories and Testing Requirements, is included in Section I.U. of this permit. [Comment last updated on 10/12/2001]

3. Comment on an item originating in DAQE-620-01 regarding permitted source (Source-wide)

AO condition 18: Unavoidable Breakdowns, is included in Section I.S.2.c of this permit. [Comment last updated on 10/12/2001]

4. Comment on an item originating in R 307-203 regarding permitted source (Source-wide)

R 307-203: This rule requires a sulfur content less than 0.85 lbs/ MM gross Btu heat input for fuel oil. The requirement R 307-203 is replaced by the more stringent requirement to burn #1 or #2 low sulfur fuels which contain less than 0.5 percent weight sulfur, or less. [Comment last updated on 11/29/2001]

5. Comment on an item originating in DAQE-620-01 regarding permitted source (Source-wide)

Sitewide VOC limit: lines 1&2 have no process VOC emissions because yeast is not used for these products. Hence, there are no emissions factors for baking on these lines. Even so, VOC emissions from combustion are included in the calculations. [Comment last updated on 11/29/2001]